

JESSE SBAIH & ASSOCIATES, LTD.
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROSE DESIO,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; DOES I – V and
ROES VI – X, inclusive;

Defendants.

Case No.: 2:20-cv-01486-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE:**

**(1) REPLY IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON THE ISSUE OF INSURANCE
COVERAGE (ECF NO. 19);**

**(2) OPPOSITION TO DEFENDANT’S
COUNTER-MOTION FOR
SUMMARY JUDGMENT (ECF NO.
32); AND**

**(2) REPLY IN SUPPORT OF
DEFENDANT’S COUNTER-MOTION
FOR SUMMARY JUDGMENT (ECF
NO. 32)**

[First Request]

PLAINTIFF ROSE DESIO (“Plaintiff”), by and through her counsel of record, JESSE SBAIH & ASSOCIATES, LTD., and DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (“Defendant”), by and through their counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, hereby stipulate and agree to the following:

(1) Plaintiff’s Reply in Support of her Motion for Partial Summary Judgment on the Issue of Insurance Coverage (ECF No. 19), which is currently due on January 18, 2021, will be extended to **February 8, 2021;**

(2) Plaintiff's Opposition to Defendant's Counter-Motion for Summary Judgment (ECF No. 32), which is currently due on January 18, 2021, will be extended to **February 8, 2021**; and

(3) Defendant's Reply in Support of its Counter-Motion for Summary Judgment (ECF No. 32) will be extended to **February 22, 2021**.

Reason for Extension

The subject extensions are sought due to the complexities of the issues being addressed in the subject pleadings, and to accommodate Plaintiff's recently and unexpectedly increased workload consisting of responding to numerous pleadings in a short time span. This is the first request for an extension and it is made in good faith and not for the purpose of delay.

DATED this 13th day of January, 2021.

DATED this 13th day of January, 2021.

JESSE SBAIH & ASSOCIATES, LTD.

LEWIS BRISBOIS BISGAARD & SMITH
LLP

/s/ Jesse M. Sbaih

/s/ Cheryl A. Grames

Jesse M. Sbaih, Esq.
JESSE SBAIH & ASSOCIATES, LTD
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Attorneys for Plaintiff

Robert W. Freeman, Esq.
Cheryl A. Grames, Esq.
Tara Teegarden, Esq.
LEWIS BRISBOIS BISGAARD & SMITH
LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, NV 89118
Attorneys for Defendant

ORDER

IT IS SO ORDERED.

Dated this 13th day of January, 2021.



U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5(b), I certify that I am an employee of the law firm of Jesse Sbaih & Associates, Ltd., and that on this 13th day of January 2021, I caused to be served **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE: (1) REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE ISSUES OF INSURANCE COVERAGE (ECF NO. 19); (2) OPPOSITION TO DEFENDANT'S COUNTER-MOTION FOR SUMMARY JUDGMENT (ECF NO. 32); AND (2) REPLY IN SUPPORT OF DEFENDANT'S COUNTER-MOTION FOR SUMMARY JUDGMENT (ECF NO. 32)** via electronic service to the following:

Robert W. Freeman, Esq.
Cheryl A. Grames, Esq.
Tara U. Teegarden, Esq.
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Robert.Freeman@lewisbrisbois.com
Cheryl.Grames@lewisbrisbois.com
Tara.Teegarden@lewisbrisbois.com
Attorneys for Defendant
State Farm Mutual Automobile Insurance Company

/s/ Jennifer Davidson
An employee of Jesse Sbaih & Associates, Ltd.

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Subject: RE: [EXT] Re: Desio v. State Farm (Extension to file Reply and Opposition)
From: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>
Date: Tue, Jan 12, 2021 5:55 pm
To: Jesse Sbaih <jsbaih@sbaihlaw.com>, "iolevic@sbaihlaw.com" <iolevic@sbaihlaw.com>
Cc: "j davidson@sbaihlaw.com" <jdavidson@sbaihlaw.com>
Attach: image001.png
Logo_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png

Looks good; you may affix my e-signature.



Cheryl A. Grames
Partner
Cheryl.Grames@lewisbrisbois.com
T: 702.583.6014 F: 702.893.3789

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From: Jesse Sbaih <jsbaih@sbaihlaw.com>
Sent: Tuesday, January 12, 2021 5:41 PM
To: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; iolevic@sbaihlaw.com
Cc: jdavidson@sbaihlaw.com
Subject: RE: [EXT] Re: Desio v. State Farm (Extension to file Reply and Opposition)

Hi Cheryl...please find attached the draft SAO for your review. Please advise if we have your consent to affix your e-signature and file with the Court.

Best regards,

Jesse M. Sbaih, Esq.
JESSE SBIAH & ASSOCIATES, LTD.
The District at Green Valley Ranch
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----- Original Message -----

Subject: RE: [EXT] Re: Desio v. State Farm (Extension to file Reply and Opposition)
From: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>
Date: Tue, January 12, 2021 2:52 pm
To: "iolevic@sbaihlaw.com" <iolevic@sbaihlaw.com>
Cc: "jsbaih@sbaihlaw.com" <jsbaih@sbaihlaw.com>, "jdavidson@sbaihlaw.com" <jdavidson@sbaihlaw.com>

Hi Ines, two weeks after the Response would be great.

Cheryl A. Grames



Partner
Cheryl.Grames@lewisbrisbois.com

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From: iolevic@sbaihlaw.com <iolevic@sbaihlaw.com>
Sent: Tuesday, January 12, 2021 1:58 PM
To: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>
Cc: jsbaih@sbaihlaw.com; jedavidson@sbaihlaw.com
Subject: RE: [EXT] Re: Desio v. State Farm (Extension to file Reply and Opposition)
Importance: High

Thank you Cheryl. I will send you a SAO for your review shortly. How much time will you need for the Reply?

Ines Olevic-Saleh, Esq.
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----- Original Message -----

Subject: RE: [EXT] Re: Desio v. State Farm (Extension to file Reply and Opposition)
From: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>
Date: Tue, January 12, 2021 1:46 pm
To: Jesse Sbaih <jsbaih@sbaihlaw.com>
Cc: Ines Olevic <iolevic@sbaihlaw.com>, Jennifer Davidson <jedavidson@sbaihlaw.com>, "Teegarden, Tara" <Tara.Teegarden@lewisbrisbois.com>

OF COURSE, Jesse. I'm sorry I didn't respond sooner. Ensconced in Ninth Circuit briefing / SER hell, as the local rule changes are really quite exacting. Those dates are fine.



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From: Jesse Sbaih <jsbaih@sbaihlaw.com>

Sent: Tuesday, January 12, 2021 1:40 PM

To: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>

Cc: Ines Olevic <iolevic@sbaihlaw.com>; Jennifer Davidson <jddavidson@sbaihlaw.com>

Subject: [EXT] Re: Desio v. State Farm (Extension to file Reply and Opposition)

External Email

Hi Cheryl...we respectfully request a response to my email below as we will need to file a motion if you don't reciprocate our prior courtesies and stipulate to our request for an extension.

Thanks,

Jesse M. Sbaih, Esq.

Sent from my iPhone

On Jan 10, 2021, at 9:14 PM, Jesse Sbaih <jsbaih@sbaihlaw.com> wrote:

Hi Cheryl...I hope all is well.

Earlier today, I finally had an opportunity to briefly review State Farm's Opposition to Ms. Desio's Motion for Partial SJ and the Countermotion for SJ.

As we are swamped and due to the complexity of the issues, I respectfully request that we be allowed until and through February 8, 2021 to file both our Reply (which is presently due on 1/18/21) and our Opposition (which is presently due on 1/25/21). Regarding your Reply, whatever time you need after February 8, 2021, we'll gladly accommodate.

Please advise me if you're agreeable and we'll prepare the stip for your review.

Best regards,

Jesse M. Sbaih, Esq.
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